

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

GEORGE W. SWEIGERT

Plaintiff,

vs.

JASON GOODMAN,

Defendant

Case No.: 2:22-cv-10002-GAD-KGA

MOTION TO DISMISS

Jason Goodman (“Goodman”) by and for himself pro se respectfully moves this Court to dismiss plaintiff’s complaint pursuant to Fed. R. Civ. P. 12(b)(6). Plaintiff has failed to state a claim upon which relief can be granted. No specific defamatory statements are quoted, and no evidence is cited. The Court does not have subject matter jurisdiction in this case because there is no cognizable claim. The Court does not have personal jurisdiction over Goodman because he does not reside in Michigan and no harm has been done in Michigan. The venue is improper because Goodman resides in New York.

BACKGROUND

Webb, his brother and their friends and associates have been scheming and perpetrating hoaxes in an ongoing effort to bring multiple lawsuits against Goodman since 2017. Goodman has been defendant in five separate civil actions that have each involved Webb and his associates. This instant action is only the latest iteration of what has become an obvious ploy at this late stage. Goodman has presented well founded allegations based on empirical facts from the Court’s own docket. Webb has failed to present any evidence to contradict even one of

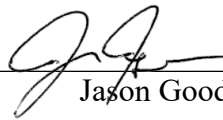
1 Goodman's well founded, good faith, evidence-based allegations. This case was brought in bad
2 faith and for an improper purpose. Rather than presenting evidence that might contradict or
3 disprove Goodman's claims, Webb has instead brought this vague, undefined set of claims in a
4 fatally defective lawsuit.
5

6 CONCLUSION

7 Pursuant to Fed. R. Civ. P. 12(b)(6), because the plaintiff has failed to state a claim upon
8 which relief could be granted, the Court should dismiss this case and investigate the evidence
9 presented in the Amended Objection to the Order to Show Cause. Both this action and Webb v
10 CNN should be dismissed with prejudice due to fraud on the Court and further investigation
11 should be carried about by the appropriate authorities.
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14 Signed this 17th day of March 2022

15 Respectfully submitted,
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